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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ROBERT RADIN,)

Defendant.)

Case No. 2:13-cr-0118-JCM-(CWH)

STIPULATION TO CONTINUE SENTENCING HEARING

(Second Request)

Certification: In accordance with Local Rule 12-1(c), the parties, by and through undersigned counsel, certify that this stipulation is timely filed.

Pursuant to this Court's Local Rule 45-1, the parties respectfully request that the Court approve this stipulation to extend the time for the sentencing hearing in this case to a date no earlier than May 20, 2016.¹ Currently, sentencing is scheduled for April 20, 2016. This is the parties' second request for a stipulation for the purpose identified herein.

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¹ Subject to the Court's convenience, Defense counsel's preference would be for the sentencing to occur the afternoon of May 26, 2016.

1 In support of this stipulation, the parties rely upon the following:

2 1. The government filed an Information (Pacer #101) in this case on December 9,
3 2015. Mr. Radin plead guilty to the one-count Information and the Court accepted his plea.
4 After setting his sentencing for March 7, 2016, the parties requested a continuance which the
5 Court granted and re-set the sentencing hearing for April 20, 2016 (Pacer #104).

6 2. Counsel for Defendant has advised government counsel that, due to his work
7 schedule and the fact that Mr. Radin resides out-of-state, additional time is needed to prepare for
8 the sentencing. Specifically, undersigned counsel for Defendant is expected to travel to Phoenix,
9 Arizona on April 19, 2016 for a meeting before the United States Attorney's Office for the
10 District of Arizona in another matter. Undersigned counsel for Defendant did not anticipate the
11 need for this meeting (which has required the coordination of several other participant's
12 schedules) at the time the prior request for continuance in this case was made. Defendant's
13 counsel anticipates being required in Phoenix on the client matter referenced above until April
14 21, 2016. Counsel for the government has indicated he has no opposition to a continuance of
15 Defendant's sentencing.

16 3. Mr. Radin, who is out of custody, does not object to this stipulation seeking a
17 continuance of his sentencing hearing.

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4. Given the significant liberty interests at stake, the parties are in agreement that defense counsel should have sufficient time to prepare for the sentencing. A continuance of at least 30-days will provide counsel with sufficient time to prepare for sentencing in this matter.

/s/ J. Gregory Damm

J. Gregory Damm, Esq.
Assistant United States Attorney

Attorney for the United States

Dated: April 13, 2016

Respectfully submitted,

/s/ Paul S. Padda

Paul S. Padda, Esq.

Attorney for Defendant

Dated: April 13, 2016

IT IS SO ORDERED:

The parties' stipulation seeking a continuance of the sentencing hearing in United States v. Robert Radin, 2:13-cr-0118-JCM-CWH is hereby approved. Sentencing shall be continued to the date and time set forth below:

Date: May 26, 2016

Time: 10:00 a.m.

[Signature]
UNITED STATES DISTRICT JUDGE

Dated: April 18, 2016

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on April 13, 2016 a copy of the foregoing document, "STIPULATION TO CONTINUE SENTENCING HEARING" was served (via the Court's CM/ECF system) upon counsel of record for the United States.

/s/ Paul S. Padda

Paul S. Padda, Esq.